

WILKERSON ♦ BRYAN

WILKERSON & BRYAN, P.C.
ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET
MONTGOMERY, ALABAMA 36104
TEL. 334.265.1500

MAILING ADDRESS
POST OFFICE BOX 830
36101-0830
FAX 334.265.0319

DANA H. BILLINGSLEY

dana@wilkinsonbryan.com

February 27, 2008

By Federal Express

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 30554

Attn: Chief, Media Bureau

**Re: Pine Belt Communications, Inc.'s Annual 47 C.F.R. § 64.2009(e) CPNI
Compliance Certification
EB Docket No. 06-36**

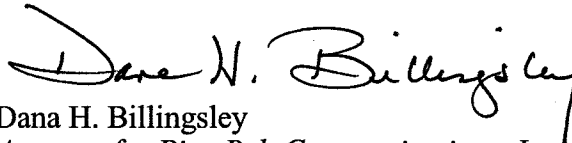
Dear Ms. Dortch:

On behalf of Pine Belt Communications, Inc., we submit the original and four (4) copies of the above-referenced annual CPNI Compliance Certification. We have also filed a copy of this Certification electronically in EB Docket No. 06-36 and have provided two (2) courtesy copies to the Commission's Enforcement Bureau and one (1) copy to Best Copy and Printing, Inc., as required under the Commission's Public Notice, DA 08-171 (released January 29, 2008).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



Dana H. Billingsley
Attorney for Pine Belt Communications, Inc.
Wilkerson & Bryan, P.C.
405 South Hull Street
Montgomery, Alabama 36104
Telephone: (334) 265-1500
Facsimile: (334) 265-0319
Email: dana@wilkinsonbryan.com

Enclosure

cc: John Nettles
FCC Enforcement Bureau
Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 27, 2008

Name of company covered by this certification: Pine Belt Communications, Inc.

Form 499 Filer ID: 801889

Name of signatory: John Nettles

Title of signatory: President

In response to the Commission's Public Notice, DA 08-171 (released January 29, 2008), Pine Belt Communications, Inc., states as follows:

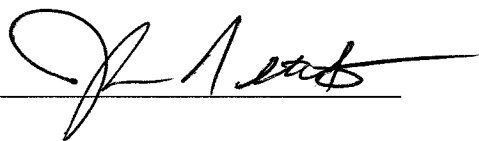
I, John Nettles, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, as set forth in 47 C.F.R. §§ 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in sections 64.2001, *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed

A handwritten signature in black ink, appearing to read "J. Nettles", is written over a horizontal line.

**Before the
Federal Communications Commission
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT
OF
PINE BELT COMMUNICATIONS, INC.**

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Pine Belt Communications, Inc., (hereinafter, "Pine Belt Communications") files the following statement of compliance with the requirements set forth in 47 C.F.R. §§ 64.2001, *et seq.* on behalf of Pine Belt Communications:

1. I have personal knowledge that Pine Belt Communications has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Pine Belt Communications obtains written approval for the use of its customers' CPNI and that Pine Belt Communications has notified its customers of their right to restrict Pine Belt Communications' use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Pine Belt Communications has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. §§ 64.2001, *et seq.* and that Pine Belt Communications has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Pine Belt Communications implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Pine Belt Communications maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Pine Belt Communications retains all such records for a minimum period of one year.

6. I have personal knowledge that Pine Belt Communications has established a supervisory review process regarding Pine Belt Communications' compliance with outbound marketing situations and that Pine Belt Communications maintains records of such compliance for a minimum period of one year. Pine Belt Communications' sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

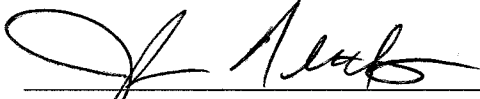
7. I have personal knowledge that Pine Belt Communications has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this 22nd day of February, 2008.

PINE BELT COMMUNICATIONS, INC.

By:



John Nettles
President